

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

In re:	)	
Cecilia Harris,	)	Case Number: 17-45281
	)	
	)	Chapter 7
Debtor.	)	

**MOTION TO SET ASIDE DISCHARGE TO FILE REAFFIRMATION  
AGREEMENT**

COMES NOW, Debtor by and through Debtor's undersigned Counsel, and move this honorable Court to set aside the Order of Discharge in Debtor's bankruptcy case under Chapter 7 and in support thereof states as follows:

1. Debtor filed a bankruptcy case under Chapter 7 in good faith on 08/02/17.
2. Debtor received a reaffirmation agreement from National Bankruptcy Services, authorized agent for Santander Consumer, on or about 10/24/17.
3. Debtor and Debtor's Counsel executed the reaffirmation agreement and returned the original via US Mail to National Bankruptcy Services. No communication was received from National Bankruptcy Services regarding the validity of the executed reaffirmation agreement.
4. Debtor received a discharge on 11/14/17.
5. On 11/15/17, one day after discharge, Debtor's Counsel received via electronic mail a reaffirmation agreement from Stewart, Zliment & Jungers, authorized agent for Santander Consumer. The email declared National Bankruptcy Services was no longer the authorized agent for Santander Consumer in this matter. Additionally, the email indicated Stewart, Zliment & Jungers would not sign the reaffirmation agreement if not received timely.
6. Debtor was not able to timely provide the executed reaffirmation agreement to Stewart, Zliment & Jungers because the reaffirmation agreement was not provided to Debtor timely.
7. Debtor stated in Debtor's schedules her intention to keep the vehicle secured by the debt owed to Santander Consumer. Debtor timely executed and provided the reaffirmation agreement to Santander Consumer's authorized agent.

8. Debtor is now required to execute a new reaffirmation agreement with Stewart, Zlimen & Jungers. A reaffirmation agreement that was provided to Debtor after discharge, at no fault of Debtor.

WHEREFORE, Debtor prays this honorable Court set aside the Order of Discharge until 12/05/17 so that Santander Consumer's new authorized agent, Stewart, Zlimen & Jungers, signs the reaffirmation agreement and files it with the Court.

RESPECTFULLY SUBMITTED,  
The Kline Law Firm, LLC  
By: /s/ Leigh Kline  
Leigh Kline, E.D. #64962, MO #64962  
125 N. Main Street  
Suite 100  
St. Charles, MO 63301  
(636) 352-2030  
(fax) (636) 896-4091  
email: Leigh@klinelawstl.com

#### CERTIFICATE OF SERVICE

The undersigned certifies that a true copy of the above was sent either electronically or by U.S. Mail, First Class, postage pre-paid to the following on November 21, 2017:

/s/ Leigh Kline

Stuart Radloff  
13321 North Outer 40 Road  
Suite 800  
Town & Country, MO 63017

Office of the United States Trustee  
111 South 10<sup>th</sup> Street, Room 6353  
St. Louis, MO 63102

Santander Consumer USA  
PO Box 961245  
Fort Worth, TX 76161

Santander/Chrysler Capital Reaff Team  
Stewart, Zlimen & Jungers  
2860 Patton Rd  
Roseville, MN 55113